

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In re Omnicom Group Inc. ERISA Litigation*

Case No.: 1:20-cv-04141-CM-SLC

October 17, 2023

**MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND  
ATTORNEYS' FEES, EXPENSES, AND CASE CONTRIBUTION AWARDS**

Plaintiffs Carol Maisonette, Shane Tepper, Surfina Adams, Michael Mensack, and Daniel Dise (collectively, “Plaintiffs”), on behalf of the Omnicom Group Retirement Savings Plan (the “Plan”) and the preliminarily certified Settlement Class of participants and beneficiaries in the Plan, hereby move (the “Motion”) pursuant to Federal Rule of Civil Procedure 23 for entry of an Order that: (1) grants final approval of the Settlement with Defendants Omnicom Group Inc., the Board of Directors of Omnicom Group Inc., and the Administrative Committee of the Omnicom Group Retirement Savings Plan as memorialized in the Settlement Agreement dated June 23, 2023; (2) maintains certification of the Settlement Class; (3) finds the manner in which the Settlement Class was notified of the Settlement was the best notice practicable under the circumstances, and fair, reasonable, and adequate; (4) approves the Plan of Allocation; and (5) awards attorneys’ fee, expenses, and case contribution awards of \$816,666.67, one-third of the Gross Settlement Amount of \$2,450,000.00, which includes case contribution awards of \$7,500.00 each to Plaintiffs.<sup>1</sup> Defendants do not oppose the Motion.

For the reasons set forth in the Settlement Agreement, accompanying memorandum of law, and all supporting papers, as well as the record in this litigation, Plaintiffs respectfully submit that

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<sup>1</sup>Terms not defined herein shall have the same meaning as in the Settlement Agreement.

the proposed settlement memorialized in the Settlement Agreement is fair, reasonable, and adequate, and should be finally approved, the Settlement Class should be maintained through entry of a final judgment, and the related applications should be granted.

Plaintiffs stand ready to provide any additional information that the Court may require in connection with its consideration of the Motion.<sup>2</sup>

Dated: October 17, 2023

Respectfully submitted,

/s/ Laurie Rubinow  
James E. Miller  
Laurie Rubinow  
MILLER SHAH LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (860) 540-5505  
Facsimile: (866) 300-7367  
Email: [jemiller@millershah.com](mailto:jemiller@millershah.com)  
[lrubinow@millershah.com](mailto:lrubinow@millershah.com)

James C. Shah  
Alec J. Berin  
MILLER SHAH LLP  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: [jcshah@millershah.com](mailto:jcshah@millershah.com)  
[ajberin@millershah.com](mailto:ajberin@millershah.com)

Anna K. D'Agostino  
MILLER SHAH LLP  
225 Broadway, Suite 1830  
New York, NY 10007  
Telephone: (866) 540-5505  
Facsimile: (866) 300-7367  
Email: [akdagostino@millershah.com](mailto:akdagostino@millershah.com)

*Attorneys for Plaintiffs, the Plan,  
and the Settlement Class*

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<sup>2</sup>If helpful to the Court, Plaintiffs would be happy to provide a Word version of the proposed Final Approval Order.

**CERTIFICATE OF SERVICE**

I certify that, on October 17, 2023, I caused the foregoing document to be filed using the Court's CM/ECF system, which thereby sent notice to all counsel of record.

/s/ Laurie Rubinow

Laurie Rubinow